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MAYOR'S OFFICE
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JAMES P. PERRON, Mayor

MUNICIPAL BUILDING
229 SO. SECOND STREET
ELKHART, INDIANA 46516

June 24, 1986

Mr. Valdas Adamkus
Regional Administrator
U.S. EPA - Region V
230 Dearborn Street
Chicago, IL 60604

Ms Nancy Maloley
Commissioner
Indiana Department of Environmental Management
105 South Meridian
Indianapolis, IN 46225

SUBJECT: Coordination on North Main Street Well Field Superfund Site and Other Groundwater Contamination Investigations in the City of Elkhart and Surrounding Environs.

Dear Administrators:

The contamination at the North Main Street Well Field was first discovered in 1981 when a sampling program of public water supplies determined that a plume of Trichloroethylene (TCE) had migrated into the aquifer which is used for producing 70% of the finished water supply for the City of Elkhart. In 1982, the site became a tentative Superfund site and in 1983, it was finally listed on the National Priority List of sites for cleanup under Superfund.

On behalf of the citizens of Elkhart, I want to thank you for your efforts on the Focused Feasibility Study Operable Unit in the form of the air stripping towers to serve the purpose of insuring acceptable quality of finished water for the citizens of Elkhart, as well as containing the plume from further migration. We recognize that this is not a complete solution, but that it does represent an important interim measure which may be of value in the ultimate long-term solution.

At this key juncture of the beginning of implementation of the Focused Feasibility Study, as well as the remedial investigation to lead to a final Feasibility Study for a long-term solution, the City of Elkhart believes it would be beneficial to have a conference of representatives of the US EPA Region V, the new representatives of the Indiana Department of Environmental Management, representatives of the Elkhart County Health Department Groundwater Section, and representatives of the City

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of Elkhart and its water utility in the near future.

I would propose that the agenda for the conference include an update on the North Main Street Well Field and what work remains to be done on the remedial investigation of sources of contamination impacting the Well Field from all compass points. Additionally, we believe it would be beneficial to have a discussion item on the agenda regarding the regulatory posture to be pursued jointly by the EPA and the Indiana Department of Environmental Management regarding the use of CERCLA, the Comprehensive Superfund law; RCRA, the Resource Conservation Recovery Act, which has been delegated to the Department of Environmental Management as a state authority program; and HSWA, Hazardous and Solid Waste Amendments of 1984 as they might impact probable responsible parties in the Elkhart area.

We should review also the emergency response areas outside the sphere of the Superfund site at North Main Street, such as the major contamination area along East Jackson Boulevard.

The City Administration has received and continues to receive many inquiries on enforcement posture toward responsible parties involved with the former Accra-Pac site and other potential responsible parties in the Industrial Parkway, as well as identified probable responsible parties on the east side of the North Main Street Well Field. As other contamination sites are identified in Elkhart, there has been a tendency by other industries to throw the examples of Accra-Pac, Excel and Durakool back at the City of Elkhart and inquire why we are not taking a stronger enforcement posture. We have indicated that at this point in time, these are federal lead investigations. We have stated that the City of Elkhart is in a support role to the EPA and the Indiana Department of Environmental Management and should not interfere in the negotiations that are taking place between the EPA and these probable responsible parties. However, we believe it is important for the City to keep abreast of the activities taking place in this regard. In view of this, I think it would be helpful to have a meeting of the minds on the role of the EPA as well as the City and get an understanding of the role of the new Indiana Department of Environmental Management on investigations and enforcement action in the Elkhart area.

Since the agenda which I have proposed contains some material that will require the agencies to do their homework, and I encourage you to add other agenda items that would be beneficial to all parties involved, I am suggesting that we allow some time this summer to prepare for the conference which

might be held prior to September of this year. I look forward to your feedback on this proposal as well as any information that you would like the City or the County Health Department to prepare.

Sincerely,

CITY OF ELKHART



James P. Perron, Mayor

cc: Governor Robert Orr
Dr. Woodrow Myers, ISBH
State Legislators
Dennis Stewart, District Chief, USGS
Mr. William Costintellis, Hazardous Material Section, EPA
Dr. Stanley Reedy, Elkhart County Health Department
Elkhart Common Council